



**Legal Aid
Society**
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April 12, 2006

VIA EXPRESS MAIL

Ms. Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

APR 13 2006

PUBLIC SERVICE
COMMISSION

**RE: In The Matter Of:
CONSIDERATION OF THE REQUIREMENTS OF THE FEDERAL ENERGY
POLICY ACT OF 2005 REGARDING TIME-BASED METERING, DEMAND
RESPONSE AND INTERCONNECTION SERVICE, CASE NO. 2006-00045**

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of the First Request for Information of Metro Human Needs Alliance to All Jurisdictional Utilities.

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter. Please contact me if you need any further information.

Sincerely,

Lisa Kilkelly
Staff Attorney

Cc: Service list



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

APR 13 2006

PUBLIC SERVICE
COMMISSION

In The Matter Of:

CONSIDERATION OF THE)	
REQUIREMENTS OF THE FEDERAL)	
ENERGY POLICY ACT OF 2005)	CASE NO.
REGARDING TIME-BASED METERING,)	2006-00045
DEMAND RESPONSE AND)	
INTERCONNECTION SERVICE)	

**FIRST REQUEST FOR INFORMATION OF METRO HUMAN NEEDS
ALLIANCE TO ALL JURISDICTIONAL UTILITIES**

Comes Metro Human Needs Alliance, by counsel, and requests the response of all jurisdictional utilities to the following Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.

REQUESTS FOR INFORMATION

1. Under a critical peak pricing and real time pricing program, as described in the Commission's order of February 24, 2006, how would you notify customers of pricing changes so that they could make adjustments in their usage?
2. Provide a general discussion of what you perceive to be the pros and cons with respect to low-income utility customers of implementing a smart metering standard in Kentucky.
3. Please describe any anticipated barriers to participation in time-based rate schedules and/or smart metering programs low-income customers might face.

4. Provide a description of any formal or informal analysis, discussion or study of the impact of any time based rate schedules and/or smart metering programs on low-income customers you have conducted or of which you are aware. Please describe any conclusions reached and provide copies of any documentation or results of such analysis, discussion or studies.
5. Would implementation of smart metering result in higher costs or rates to nonparticipating customers? Please describe any projected costs by category and amount, including any costs of installing, maintaining or reading new meters or other technology, and any systemic or program changes, such as software and billing changes, that you expect to be charged directly (or indirectly by higher rates) to nonparticipating customers.
6. Describe in general the availability of the technology for smart meters, including:
 - a) How many suppliers provide smart meters and related technology;
 - b) The price range for smart meters.
7. How accurate are the available smart meters? Have these meters been sufficiently tested for accuracy both prior to installation and in actual use?
8. How reliable are smart meters? Have any specific maintenance problems been identified?
9. Low income customers are often considered unable to lower energy use because of poor housing stock and/or use of older, inefficient appliances. Would you assist in enhancing or enlarging weatherization programs to help make smart meters an advantage to low-income customers?
10. If you implement time based rate schedules and/or smart metering, would you make any attempt to target any particular types of customers for participation?

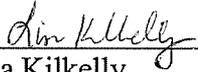
Respectfully submitted,



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NEEDS ALLIANCE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing First Request for Information of Metro Human Needs Alliance was served on the attached service list on the 12th day of April, 2006, United States mail, postage prepaid.



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